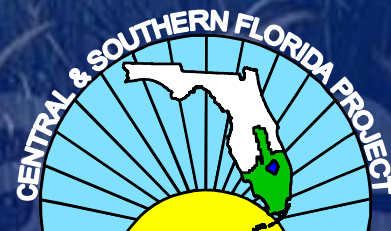


Master Implementation Sequencing Plan (MISP), Consultation with Task Force



COMPREHENSIVE
EVERGLADES
RESTORATION PLAN

General Comments

- **MISP Document should clarify rationale for changes to 1999 plan**
- **MISP document should include model runs of performance based on sequencing plan**
- **Corps must ensure timely completion of Modified Water Deliveries and C-111**
- **Inclusion of acceler8 program pushes non Everglades projects ahead of those vital to restoration and could actually cause Everglades restoration projects to languish for lack of money and focus.**

General Comments

- **Inclusion of Acceler8 projects in new MISPP for SFWMD construction is inconsistent with WRDA 2000 direction for Secretary of Army to construct.**
- **Funding impacts caused by acceler8 changes the entire cost share arrangement with the State**
- **No analysis is provided of the new working arrangements between state and Federal government for Acceler8 projects**

Land Acquisition Related Comments

- **The MISP must account for development pressure and rising land values in sequencing components.**
- **Funding for land acquisition should continue to be front-loaded, and made available throughout implementation to purchase land necessary to meet all restoration objectives, including increasing the spatial extent of wetlands and other habitat.**
- **Regulations, permitting practices, and management plans should be developed to prevent development that is inconsistent with restoration goals from occurring, either within or adjacent to project study areas and footprints.**

Consultation and Public Involvement Comments

- **Development and inclusion of the Acceler8 projects into the MISIP is inconsistent with the Task Force consultation requirements of the programmatic Regulations.**
- **Corps has not consulted with Miccosukee Tribe of Indians on inclusion of Acceler8 into MISIP.**
- **Development and inclusion of Acceler8 program was done behind closed doors and is inconsistent with the programmatic regulations**
- **Use of MISIP team to make policy decisions appears to be a FACA violation**

NEPA Related Comments

- **MISP document should include appropriate NEPA analysis and document for review**
- **There is a violation of NEPA by not preparing Supplemental Environmental Impact Statement on inclusion of State's accelerate plan and impacts to 1999 sequencing plan**
- **Draft MISP must comply with the Endangered Species Act.**

Environmental Comments

- **Draft MISP significantly delays implementation of large portions of expected CERP ecological benefits and compromises ability to achieve restoration.**
- **Sequencing plan does not halt decline of existing wildlife habitat for threatened and endangered species and will further endanger those species due to loss of habitat.**
- **Sequencing plan will interfere with goal of increasing spatial extent of wetland areas.**
- **Significant adverse impacts to species due to current sequence which postpones critical land acquisition.**

Evaluation Comments

- Use of 1999 benefit analysis does not allow cost effective benefit analysis of revised sequencing plan
- Since 1999 sequencing is used to establish interim goals and targets, there can be no connection between the revised MISPP and the interim goals and targets
- Savings Clause analysis is needed for each project under new sequencing plan to ensure no violation of the WRDA 2000 clause

Evaluation Comments

- **Implementation of L-31N Seepage management pilot and WCA Seepage Management must adequately protect Biscayne Bay resources**
- **Implementation of Decomp components, such as canal filling, must follow other components that offset any potential adverse impacts to water supply for Miami-Dade area**

Project Sequencing

- **Additional Projects that should be included in Band 1**
 - **Miami Dade Seepage Management**
 - **Portions of Bird Drive Recharge**
 - **Remaining Part of EAA, Biscayne Bay Coastal Wetlands, and C-111 spreader**
 - **Waste Water Reuse Pilot**

Project Sequencing

- **Projects that should be accelerated in overall schedule:**
 - **Acquisition of IRL Natural Areas**
 - **Acquisition of Bird Drive lands**
 - **Construction of Portions of Decomp**
 - **Construction of Tamiami Trail Culverts**
 - **Development of Tentatively Selected Plan for Biscayne Bay Coastal Wetlands**

Questions?

